



STATE OF WASHINGTON
WASHINGTON STATE BOARD OF HEALTH
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May 12, 2004

TO: Washington State Board of Health

FROM: Tom Locke, WSBOH Member

RE: **WAC 246-100-166—IMMUNIZATION OF CHILD CARE AND SCHOOL CHILDREN AGAINST CERTAIN VACCINE-PREVENTABLE DISEASES**

Background and Summary

In April 2003, the Board filed a [CR-101](#) (Preproposal Statement of Inquiry) on [WAC 246-100-166](#), which concerns immunization of childcare and school children against certain vaccine preventable diseases. The intent was to redraft the rule to increase its readability and thus to reduce confusion. This WAC has not been rewritten since 1997, and in the meantime new technologies have made it possible to consider a single reporting date for schools, preschools, and child care centers; and to offer electronic filing in addition to the paper form. The Advisory Committee on Immunization Practices (ACIP) has also changed its recommended intervals between vaccinations and ages of administration since 1997 (see attached schedule). These changes are not reflected in the current rule.

This CR-101 has a narrow focus and does not allow the Board to consider changes that would take into account scientific advances in vaccine development, changes in the ACIP recommendations about which immunizing agents children should receive, or public concern about the safety of vaccines.

Currently WAC 246-100-166 specifies that “full immunization” means that children are vaccinated against: diphtheria, tetanus, pertussis or whooping cough, measles or rubella, rubella, mumps, poliomyelitis, haemophilus influenzae type b disease and hepatitis b. Representatives of vaccine manufacturers have repeatedly approached the Board staff, the Department of Health, and the Legislature about adding new combination vaccines and new vaccines against other antigens (specifically, varicella or chickenpox). In the past, the Board has modified its list of mandated agents on a case-by-case basis. Given the pace of vaccine research, the Board would be served well by clearly articulating the public health rationale for vaccine mandates and developing a set of criteria for determining which immunization agents should be required for school entry.

I propose continuing to redraft the rule to improve its clarity, take advantage of new reporting technologies, and update ACIP recommendations regarding ages and intervals. In addition, I propose establishing an advisory group on school entry immunization that would develop a set of criteria for determining when an immunizing agent should be mandated for school entry and to

evaluate the list of currently mandated vaccines and new vaccines against those criteria using public health principles.

Attached for your review is a description of the proposed process, including a suggested timeline, and a matrix briefly listing the issues that will be taken up during different phases of this work.

Recommended Board Action

I recommend the Board consider adopt the following motion:

The Board accepts the recommendations that it:

- 1) Work with the Department of Health to convene an advisory group on vaccination requirements as a condition of school entry. The group's primary charge should be to develop criteria for determining whether specific immunizing agents should be required, assess current and proposed agents against those criteria, and recommend a list of required agents for the Board to consider adopting in rule.***
- 2) Continue ongoing efforts to update and clarify the existing rule, WAC 246-100-166.***